



To: Carlyn Prisk/R3/USEPA/US@EPA cc: Ben Breskman <bbrskmn@fast.net>

Subject: Sentry Paint - response to information request

Ms Prisk -

Re the Lower Darby Creek Area Superfund site, Sentry Paint has prepared the attachment in response to your request of 15-Apr-02.

A physical copy of this attachment, signed by Benjamin S Breskman (President & CEO), is being mailed to you this afternoon via the US Postal Service.

Craig Brosi

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RESPONSE to QUESTIONS presented in ENCLOSURE "F"

Sentry Paint Technologies, Inc
237 Mill Street
Darby, Pennsylvania 19023

phone: 610-522-1900

- 1. a. Sentry Paint Technologies has been incorporated in Pennsylvania since October 17, 1949.
- 1. b. Sentry Paint (then named Sentry Paint and Chemical Company) was originally incorporated on October 17, 1949, in Pennsylvania.
- 1. c. Sentry does not have a parent corporation. Sentry has no subsidiaries. Sentry is involved in a joint venture with Sheboygan Paint. The joint venture is:

Atomized Powder Coatings 4141 2nd Parkway Terre Haute, Indiana 47804 phone: 812-466-1362

2. Sentry Paint manufactures conventional, high-solids, and waterborne coatings for Original Equipment Manufacturers (OEM). All products are designed/formulated specifically for the customer and are manufactured make-to-order. The business operated in substantially this same manner between 1958 and 1976.

Between 1958 and 1963, Sentry (then named Sentry Paint and Chemical Company) was located at 15 East Allen Street in Philadelphia. Sentry moved to its current location in Darby during the first 5 months of 1963. Between 1963 and 1976, Sentry was located at its current address (237 Mill Street in Darby).

3. Between 1958 and 1976, Sentry was managed by Joseph S Breskman, who (along with his wife, Dorothy) had founded the company in 1949. He has some personal knowledge of operations, including waste disposal practices, during the referenced time period. Mr Breskman, no longer directly involved in the day-to-day operations of the company, maintains two residences:

100 Sunrise Avenue - suite 401E

phone: 561-659-1733

Palm Beach, Florida 33480

191 Presidential Boulevard

phone: 610-660-6109

Bala Cynwyd, Pennsylvania 19004

George Little was employed as Operations Manager from 1957 to 1987. We have no record of either his past or current address.

- 4. Joseph S Breskman has been the majority owner and operator of Sentry Paint throughout the entire existence of the company.
- 4. a. Joseph S Breskman has operated Sentry Paint from 1949 to the present.
- 4. b. Sentry Paint manufactures OEM, high-solids, and waterborne coatings. All products are designed/formulated specifically for the customer and are manufactured make-to-order.
- 4. c. No current employees have any knowledge regarding information or documents relating to the handling/disposal of waste materials between 1958 and 1976. No such documents are known to exist.

Sentry Paint experienced a severe flood on 16-Sep-99. This flood (see enclosure) resulted from heavy rain associated with the passage over the northeast of the remnants of Hurricane Floyd. Flood waters exceeded 5 feet in the offices, 12 feet in the manufacturing plant, and 17 feet in the back parking lot. Any documents still in existence during the summer of 1999 were presumably destroyed in this flood.

- 5. No current employees have any knowledge regarding the types of documents that were generated/maintained by Sentry concerning the handling/disposal of waste materials between 1958 and 1976. No such documents are known to exist. (Any documents still in existence during the summer of 1999 were presumably destroyed in the flood of 16-Sep-99.)
- 6. No records are known to exist from the period between 1958 and 1976. However, we know that paint manufactured during the referenced time period would have consisted primarily of a mixture of solvent, vehicle (resin), and pigment. But, no actual records exist to provide any data regarding the purchase, use, storage, or any other aspect of handling for any specific material during the referenced time period.
- 7. Any waste generated between 1958 and 1976 would have consisted primarily of a mixture of solvents, used for equipment cleaning. This waste material would have been a liquid that was contaminated with small amounts of resin and pigment. This liquid would have been handled in drums (55-gallon).

No records exist to provide any actual data regarding the disposal of any material during the referenced time period.

8. To the best of our knowledge, Sentry Paint did not have any business relationship with any of the companies listed in question 8.

No records exist to provide any actual data regarding the disposal of any material during the referenced time period.

- 9. To the best of our knowledge, no waste material from Sentry Paint was transported to, or disposed of at, Clearview Landfill, Folcroft Landfill, or Folcroft Landfill Annex.
- 10. To the best of our knowledge, no waste material from Sentry Paint was transported to, or disposed of at, Clearview Landfill, Folcroft Landfill, or Folcroft Landfill Annex.
- 11. To the best of our knowledge, Sentry Paint never spilled or released any materials of any kind at Clearview Landfill, Folcroft Landfill, or Folcroft Landfill Annex.
- 12. Between 1958 and 1976, Sentry was managed by Joseph S Breskman. He had overview responsibility for disposal of waste materials. Mr Breskman, no longer directly involved in the day-to-day operations of the company, maintains two residences:

100 Sunrise Avenue - suite 401E

phone: 561-659-1733

Palm Beach, Florida 33480

191 Presidential Boulevard

phone: 610-660-6109

Bala Cynwyd, Pennsylvania 19004

George Little was employed as Operations Manager from 1957 to 1987. We have no record of either his past or current address.

These are the same individuals identified in our answer to question 3.

- 13. To the best of our knowledge, Sentry Paint was never involved in any way with any environmental assessments/investigations relating to Clearview Landfill, Folcroft Landfill, or Folcroft Landfill Annex.
- 14. Sentry Paint has no knowledge of any other parties who may have information relating to contamination at Clearview Landfill, Folcroft Landfill, or Folcroft Landfill Annex.

15. a. These questions have been answered by:

R Craig Brosi, Quality Manager Sentry Paint Technologies, Inc 237 Mill Street Darby, Pennsylvania 19023 phone: 610-522-1900

Benjamin S Breskman, President & CEO Sentry Paint Technologies, Inc

phone: 610-522-1900

phone: 610-522-1900

237 Mill Street

Darby, Pennsylvania 19023

15. b. Future correspondence should be directed to:

Benjamin S Breskman, President & CEO Sentry Paint Technologies, Inc 237 Mill Street Darby, Pennsylvania 19023

- 16: The documents solicited in this information request are no longer available. All relevant records are presumed to have been destroyed. We surmise that most records were destroyed in conformance with then-current document retention policies. And, any documents still in existence during the summer of 1999 were presumably destroyed in the flood of 16-Sep-99.
- 16. a. No current employees have any knowledge regarding the document retention policy that would have applied to waste disposal information during the period between 1958 and 1976. Our present policy, designed to conform with 40 CFR, is to retain waste disposal manifests and related records for a minimum of 3 years.
- 16. b. An unknown quantity of records were destroyed in the flood of 16-Sep-99. No other information exists relating to the destruction of documents from the period 1958 to 1976.
- 16. c. No current employees have any direct knowledge of the information content of any documents relating to the period between 1958 and 1976.
- 16. d. No current employees have any knowledge of the person(s) who would have produced, retained, and/or destroyed documents relating to the period between 1958 and 1976.